

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of the Joint Application of Frontier Communications Corporation, New Communications of the Carolinas Inc., New Communications Online and Long Distance Inc., Verizon South Inc., Verizon Long Distance LLC, and Verizon Enterprise Solutions LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2009 - 220 - C

(Please type or print)

Submitted by: Sue-Ann Gerald ShannonAddress: McNair Law Firm, P.A.P O Box 11390Columbia, SC 29211SC Bar Number: 71181Telephone: 803-799-9800Fax: 803-753-3219

Other: _____

Email: sshannon@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other: _____

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☐ Electric☐ Electric/Gas☐ Electric/Telecommunications☐ Electric/Water☐ Electric/Water/Telecom.☐ Electric/Water/Sewer☐ Gas☐ Railroad☐ Sewer☒ Telecommunications☐ Transportation☐ Water☐ Water/Sewer☐ Administrative Matter☐ Other: _____☐ Affidavit☐ Agreement☐ Answer☐ Appellate Review☐ Application☐ Brief☐ Certificate☐ Comments☐ Complaint☐ Consent Order☐ Discovery☐ Exhibit☐ Expedited Consideration☐ Interconnection Agreement☐ Interconnection Amendment☐ Late-Filed Exhibit☒ Letter☐ Memorandum☐ Motion☐ Objection☐ Petition☐ Petition for Reconsideration☐ Petition for Rulemaking☐ Petition for Rule to Show Cause☒ Petition to Intervene☐ Petition to Intervene Out of Time☐ Prefiled Testimony☐ Promotion☐ Proposed Order☐ Protest☐ Publisher's Affidavit☐ Report☐ Request☐ Request for Certification☐ Request for Investigation☐ Resale Agreement☐ Resale Amendment☐ Reservation Letter☐ Response☐ Response to Discovery☐ Return to Petition☐ Stipulation☐ Subpoena☐ Tariff☐ Other: _____

Print Form

Reset Form

July 7, 2009

Sue-Ann G. Shannon

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via Electronic Filing

Charles L. A. Terreni
Chief Clerk and Administrator
SC Public Service Commission
PO Drawer 11649 (29211)
101 Executive Center Drive
Suite 100
Columbia, SC 29210

Re: In the Matter of the Joint Application of Frontier Communications Corporation, New Communications of the Carolinas Inc., New Communications Online and Long Distance Inc., Verizon South Inc., Verizon Long Distance LLC, and Verizon Enterprise Solutions LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates
Docket No. 2009-220-C

Dear Mr. Terreni:

Enclosed for filing please find a Petition to Intervene on behalf of the South Carolina Telephone Coalition in the above-referenced docket. By copy of this letter and certificate of service, a copy is being served on all parties of record.

Sincerely,

McNAIR LAW FIRM, P.A.



Sue-Ann G. Shannon

Attachment

cc: Parties of record

McNair Law Firm, P. A.
The Tower at 1301 Gervais
1301 Gervais Street, 11th Floor
Columbia, SC 29201

Mailing Address
P.O. Box 11390
Columbia, SC 29211

mcnair.net

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2009-220-C

In the Matter of the Joint Application of Frontier)	
Communications Corporation, New Communications)	
of the Carolinas Inc., New Communications Online and)	PETITION TO
Long Distance Inc., Verizon South Inc., Verizon Long)	INTERVENE
Distance LLC, and Verizon Enterprise Solutions LLC for)	
Approval of the Sale of Assets and the Transfer of)	
Authority and Certificates)	
_____)	

In response to the Commission's Notice of Filing and Hearing of the Joint Application of Frontier Communications Corporation ("Frontier"); New Communications of the Carolinas, Inc. ("NewILEC"); New Communications Online and Long Distance, Inc. ("NewLD"); and Verizon South Inc., Verizon Long Distance LLC, and Verizon Enterprise Solutions LLC (collectively, "Verizon"), for approval to transfer certain local exchange and long distance businesses in South Carolina to companies to be owned and controlled by Frontier and for such other approvals, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. SCTC member companies and their affiliates are local exchange and interexchange carriers operating in South Carolina.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's position in this docket has not yet been fully developed, but SCTC has an interest in this proceeding because Commission action with respect to the Joint Application would potentially impact SCTC member companies. A number of the SCTC companies have affiliates that operate in Verizon's service areas. Moreover, SCTC believes that its participation in this docket is necessary not only to protect the interests of its member companies, but also to provide the Commission with additional input on how the Joint Application will affect telecommunications operations in South Carolina.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
Sue-Ann Gerald Shannon
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

July 7, 2009

Columbia, South Carolina.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Docket No. 2009-220-C

IN RE:

In the Matter of the Joint Application of Frontier
Communications Corporation, New Communications
of the Carolinas Inc., New Communications Online and
Long Distance Inc., Verizon South Inc., Verizon Long
Distance LLC, and Verizon Enterprise Solutions LLC for
Approval of the Sale of Assets and the Transfer of
Authority and Certificates

**CERTIFICATE
OF
SERVICE**

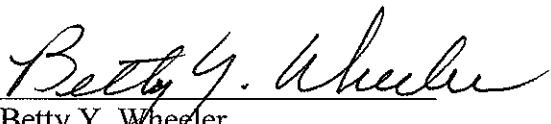
I, Betty Y. Wheeler, do hereby certify that I have this date served one (1) copy of the South Carolina Telephone Coalition's Petition to Intervene, filed on their behalf in the above-referenced Docket, upon the following by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as follows

C. Jo Anne Wessinger Hill, Esquire
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July 7, 2009
Columbia, South Carolina